

Memorandum

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SR
127 for
Juaca
pstr*

To: SRIKANTH BALASUBRAMANIAN
Project Manager

Date: September 9, 2002

File: 09-30520


From: BRAD R. METTAM
Chief, Office of Regional Planning
District 9 Planning

Subject: Comments on Draft Feasibility Study Report on Potential Improvements to SR127,
routed August 9, 2002

Thank you for the opportunity to review this draft report. This iteration is a considerable improvement over the earlier draft, and our comments will therefor generally address specific suggested changes. There is one general comment we would like to make. We have been focusing on what is essentially the worst case scenario: heavy-haul trucks. This was done in order to simplify the analysis by eliminating the need for different analyses based on different modal and vehicle choices, and because the heavy-haul scenario has the most impact on our facilities and on traffic operations. However, somewhere in the introduction or background we should acknowledge that we have been examining only the heavy-haul transport options, and that other modal or vehicle choices that result in the use of state transportation facilities will have impacts that will also need to be identified and mitigated.

SPECIFIC COMMENTS

1. *Introduction*, Page 1, paragraph 1, line 4: We recommend the deletion of the word "potential" before "segment", as it was already stated earlier in the sentence.
2. Page 1, paragraph 1, line 8: The "C" in "city of Las Vegas" should be capitalized.
3. *Background*, Pages 1-2, paragraph 1: This discussion of the current status of the political and legal dispute over site suitability determination will quickly become dated. We recommend you retain the first two sentences, then finish the paragraph by adding: "President Bush has approved the site, allowing the DOE to apply for a license from the Nuclear Regulatory Commission (NRC) to build the facility (subject to potential legal challenges)."

4. *Background*, page 2, paragraph 2, line 5: I checked these statistics (number of sites, etc.) with the DOE. They confirmed them all, except they consider the number of states impacted by transportation to be 45.
5. *Background*, page 2, paragraph 3, line 1: We suggest you change "DOE may be considering using..." to "DOE may consider using". Later in this sentence, we suggest you change "in addition to its rail transportation" to "in conjunction with its rail transportation".
6. *Accident Rates*, page 6, table: As I believe all of the rates shown in the table are in accidents per million vehicles, you should footnote the title of the table instead of each location entry.
7. *Traffic Volume and LOS*, page 7-8, charts: In place of the two charts on these pages, we recommend using the chart and data below:

State Route 127						
	San Bernardino County		Inyo County			
Segment	1	2	1	2	3	4
KP	0.00/1.03	1.03/66.79	0.00/23.80	23.80/26.44	26.44/67.83	67.83/79.53
PM	0.00/0.64	0.64/41.47	0.00/14.78	14.78/16.42	16.42/42.13	42.13/49.39
Length (km)	1.03	65.76	23.8	2.64	41.39	11.7
Length (m)	0.64	40.83	14.78	1.64	25.7	7.27
Design Hour 30th Highest	350	100	146	137	57	116
AADT 2001	1800	800	900	400	300	600
AADT 2011	2109	956	990	440	330	660
AADT 2021	2520	1120	1098	488	366	732
Truck Volume	10.20%	10.30%	10.60%	17.00%	22.00%	30.00%
Year 2002 LOS	C	A	A	A	A	A
V/C	0.15	0.06	0.06	0.03	0.02	0.03
Year 2012 LOS	C	A	A	A	A	A
V/C	0.17	0.07	0.07	0.03	0.02	0.04
Year 2022 LOS	0.21	A	B	A	A	A
V/C	C	0.08	0.08	0.03	0.02	0.04

8. *SR-127 Curve Realignment*, page 10, paragraph 2, Please confirm that the estimates for realignment of sections of the highway are included in the estimate. The first sentence in this paragraph also contains an unclear phrase: "which occasionally if flooded". Please clarify.

9. *No-Build Alternative*, page 10-11: This section should close with the recommendation that State Route 127 should not be used for the transport of highway route controlled quantities of radioactive materials if the no-build alternative is selected.
10. *System and Regional Planning*, page 11, paragraph 2: The last sentence in this paragraph: "No new land development projects on existing land are known at this time" is incorrect. We recommend that this sentence be replaced with the following information: "The Timbisha Shoshone Tribe recently acquired approximately 1000 acres of land in trust at Death Valley Junction (the intersection area of SR190 and SR-127). The Tribe's General Economic Development Plan indicates that the type of uses anticipated to occur with the development of this land is visitor/travel services and residential. The scale of such development and activity would include a service station/convenience store (with propane, gasoline and diesel), a gift/souvenir shop, and single-family detached housing units. Preliminary surveys and studies have been conducted for this trust land."
11. *Environmental Determination and Environmental Issues*, page 11, paragraph 1: The time estimated for completion of the environmental determination (2013) is not acceptable, given the estimated beginning of shipments in 2010. We recommend that the following statement be included at the end of this section: "Due to the critical need for these improvements, it is recommended that any means available to shorten the delivery of a completed environmental document be considered. This specifically includes the use of contractor support to conduct the necessary studies and prepare the document."
12. *Right-of-Way*, page 12, paragraph 1: In the bullet list, the reference to prescriptive rights should be removed. Prescriptive rights cannot be acquired over public lands. While the bullet would be correct without the parenthetical reference, if needed you should reference Revised Statute 2477.
13. *Right-of-Way*, page 12, paragraph 2: The discussion of potential property to be acquired should reference property *or easements* to be acquired. The list of potential property owners should also reference Timbisha Shoshone Tribal lands.

Thank you for the opportunity to review this report. Please contact me if you have any questions, or if any items require expansion or clarification.

c: Katy Walton, D9 Deputy District Director, Planning & Programming

BRM/brm